IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Roland E. **VILLACORTA et al.**	Art Unit: 3691
Application No.: 10/685,865	Examiner: Shrestha, Bijendra K.
Filed: October 15, 2003	Confirmation No.: 5769
For: **SYSTEM AND METHOD FOR MANAGING CREDIT RISK FOR INVESTMENT PORTFOLIOS**	

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

RESPONSE TO FINAL OFFICE ACTION

Dear Commissioner:

In response to the Final Office Action mailed June 23, 2011, please amend the above-identified application as follows:

Amendments to the Claims are reflected in the listing of claims which begins on page 2 of this paper; and

Remarks begin on page 6 of this paper.

CERTIFICATE OF TRANSMISSION

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with 37 C.F.R. 1.6(a)(4).

Dated: September 23, 2011 Signature: /Christopher J. Capelli/ (Christopher J. Capelli)